

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

Kursten Owen, individually and d/b/a
Elegance & Geekery LLC,
Plaintiff,

v.

Breana Askew (individually and d/b/a Brerami),
Kiandria Demone Boyce, and Does 1-100,
Defendants.

Case No. 6:25-cv-1292-AA

MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION

COMES NOW the Defendant, Kiandria Demone Boyce, appearing pro se, and respectfully moves this Court to dismiss the Complaint pursuant to Rule 12(b)(2) of the Federal Rules of Civil Procedure for lack of personal jurisdiction. In support of this Motion, Defendant states the following:

1. I reside in Marietta, Georgia. I do not reside in, own property in, work in, or conduct business in the state of Oregon.
2. I do not have any physical presence, offices, employees, or systematic business contacts within the state of Oregon.
3. All of the alleged conduct in the Complaint occurred online. At no time did I direct any conduct or communication specifically toward the state of Oregon or any of its residents.
4. At the time of the alleged events, I was unaware that the Plaintiff resided in or conducted business in Oregon. Jurisdiction requires intentional targeting, which I did not do. At no time did I reference Oregon, know the Plaintiff resided in Oregon, or direct my online activity toward that state.
5. I do not have the minimum contacts required for this Court to exercise personal jurisdiction over me consistent with the Due Process Clause of the United States Constitution.

6. I have never entered the state of Oregon or directed any claims or statements to the state of Oregon.

WHEREFORE, Defendant respectfully requests that this Court dismiss the action in its entirety for lack of personal jurisdiction.

Respectfully submitted,

Kiandria Demone Boyce
Pro Se Defendant

Date: August 05, 2025

CERTIFICATE OF SERVICE

I hereby certify that on this date, I served a true and correct copy of the foregoing Motion to Dismiss for Lack of Personal Jurisdiction by mailing it via United States Postal Service, first-class mail, postage prepaid, addressed to:

Kursten Owen
1665 Marten Ave SW
Albany, OR 97321

Executed on this ____ day of _____, 2025.

Kiandria Demone Boyce
Pro Se Defendant